

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

JAMES G. ABOUREZK, JANE FONDA, and
ROXANNE DUNBAR-ORTIZ,

Plaintiffs,

vs.

PROBUSH,COM, INC., a Pennsylvania
Corporation, MICHAEL MARINO, an
individual and BENJAMIN MARINO, an
individual,

Defendants.

Civ. 03-4146

**STIPULATION AND MOTION
TO EXTEND DEADLINES**

COMES NOW the Parties, represented by and through counsel, with this Stipulation and Motion to Extend Deadlines in light of the addition of new parties.

THE PARTIES HEREBY STIPULATE, by and through their attorneys, that the Scheduling Order be modified as follows:

All Motions, other than Motions in Limine, together with supporting briefs, shall be filed and served on or before July 2, 2005; that opposing parties shall file and serve answering materials and briefs on or before August 12, 2005; and reply briefs shall be filed and served on or before August 26, 2005.

That final lists of witnesses and exhibits under Rule 26(a)(3) shall be filed and served by Plaintiff and by Defendant ten (10) working days before trial, and the parties shall have five (5) days after service of such lists to file and serve objections thereto under Rule 26(a)(3).

All motions in limine, with supporting authority, shall be in writing and filed, together with proposed instructions, with support authority, with the Court ten (10) working days before

trial.

THE PARTIES ALSO HEREBY MOVE the Court for modification of the Scheduling Order to reflect the newly stipulated dates noted above.

Dated this 19th day of July, 2005.

JOHNSON, HEIDEPRIEM, MINER,
MARLOW & JANKLOW, LLP

/S/ RONALD A. PARSONS, JR.

Filed Electronically
Ronald A Parsons, Jr.
431 North Phillips Avenue, Suite 400
P.O. Box 1107
Sioux Falls, SD 57101-1107
(605) 338-4304

Attorneys for Defendant

Dated this ____ day of July, 2005.

ABOUREZK LAW FIRM

/S/ CHARLES ABOUREZK

Filed Electronically
Charles Abourezk
PO Box 9460
Rapid City, SD 57709-9460
(605) 342-0097

Attorneys for Plaintiffs